The Dingley Press
Androscoggin County
Lisbon, Maine
A-506-70-A-I

Departmental
Findings of Fact and Order
Air Emission License

After review of the Initial Part 70 License application, staff investigation reports and other documents in the applicant's file in the Bureau of Air Quality, pursuant to 38 M.R.S.A, Section 344 and Section 590, the Department finds the following facts:

I. Registration

A. Introduction

FACILITY	The Dingley Press (Dingley)
LICENSE NUMBER	A-506-70-A-I
LICENSE TYPE	Initial Part 70 License
SIC CODES	2752
NATURE OF BUSINESS	Commercial Lithographic Printing
FACILITY LOCATION	Lisbon, Maine
DATE OF LICENSE ISSUANCE	February 28, 2001
LICENSE EXPIRATION DATE	February 28, 2006

B. Emission Equipment

The following emission units are addressed by this Part 70 License:

EMISSION UNIT ID	UNIT CAPACITY	UNIT TYPE
Pre-press Operations	N/A	Process Equipment
Press #1	700 ft/min	Process Equipment*
Press #1 Dryers	3.2 MMBtu/hr total	Fuel Burning
Press #3	1,650 ft/min	Process Equipment*
Press #3 Dryers	8.5 MMBtu/hr total	Fuel Burning
Press #4	2,200 ft/min	Process Equipment*
Press #4 Dryers	9.2 MMBtu/hr total	Fuel Burning
Press #5	3,000 ft/min	Process Equipment*
Press #5 Dryers	5.34 MMBtu/hr total	Fuel Burning
Catalytic Incinerator	3.02 MMBtu/hr	Fuel Burning / Pollution Control Equipment
Thermal Oxidizer	9.0 MMBtu/hr	Fuel Burning / Pollution Control Equipment
Bindery / Ink Jet Operations	250 – 333 catalogs per min per line	Process Equipment*
Cold Cleaning Degreasers (4)	N/A	Misc. Equipment

Note: * - Unit capacities for process equipment are listed for informational purposes only and are not intended as license restrictions.

Dingley has additional insignificant activities which do not need to be listed in the emission equipment table above.

C. Application Classification

The application for Dingley does not include the licensing of increased emissions or the installation of new or modified equipment, therefore the license is considered to be an Initial Part 70 License issued under Chapter 140 of the Department's regulations for a Part 70 source.

II. EMISSION UNIT DESCRIPTION

A. Process Description

Dingley operates four printing presses and supporting equipment. Each press is a web fed heatset offset lithographic printing press and is comprised of multiple printing units and dryers. Supporting equipment includes pre-press operations, bindery/ink jet printing lines, and cold cleaning degreasers.

In offset lithographic printing the ink in each printing unit is transferred from a lithographic plate to a rubber-covered cylinder and then to the substrate. Once the ink is applied the web is heat dried and chilled before coating with silicone, then cut, folded, and sent to the publication binding lines.

B. Pre-press Operations

Dingley operates several pieces of equipment used for pre-press processing including developing film, cleaning film, developing plates, and cleaning plates. These plates are later used on the press line. Dingley also operates a proof machine which allows a single copy proof to be printed out before running the order on the press.

VOCS and HAPS

In a previous license a Best Available Control Technology (BACT) analysis was preformed on this operation. The Pre-press Operations are therefore exempt from VOC RACT (MEDEP Chapter 134, Section 1.C.2). Based on the relatively small quantity of pollutants, additional control equipment was found not to be economically justified. BACT for the Pre-press Operations was determined to be the continuation of good housekeeping practices.

C. Printing Presses, Dryers, and Associated Control Equipment

Dingley is licensed to operate the following lithographic printing presses and associated dryers:

Unit	Control Equipment	Stack #
Press #1	Catalytic Incinerator	1
Press #3	Thermal Oxidizer	2
Press #4	Catalytic Incinerator	1
Press #5	Thermal Oxidizer	2

Press #1
Press #1, model MK6, was manufactured by Hantscho in 1972. The raw materials that feed Press #1 are paper, inks, fountain solution, and blanket wash.

The Press #1 Dryers are two (2) Series 80 Tec-Systems dryers with a combined heat input of 3.2 MMBtu/hr firing natural gas or propane.

VOC and HAP emissions from the dryers are controlled by a Quantum 7000 catalytic incinerator shared with Press #4.

Press #3
Press #3, model L-750, was manufactured by Mitsubishi in 1988. The raw materials that feed Press #3 are paper, inks, fountain solution, and blanket wash.

The Press #3 Dryers are two (2) model OF-4413A dryers manufactured by Thermofoil with a combined heat input of 8.5 MMBtu/hr firing natural gas or propane.

VOC and HAP emissions from the dryers are controlled by a Wolverine RTO-25,000 thermal oxidizer shared with Press #5.

Press #4
Press #4, model L-1100, was manufactured by Mitsubishi in 1995. The raw materials that feed Press #4 are paper, inks, fountain solution, and blanket wash.

The Press #4 Dryers are two (2) Coanda Plus model dryers manufactured by Tec-Systems with a combined heat input of 9.2 MMBtu/hr firing natural gas or propane.

VOC and HAP emissions from the dryers are controlled by a Quantum 7000 catalytic incinerator shared with Press #1.

Press #5

Press #5, model M-3000, was manufactured by Heidelberg Harris in 1999. The raw materials that feed Press #5 are paper, inks, fountain solution, and blanket wash.

The Press #5 Dryers are two (2) model E 121-146 dryers manufactured by Heidelberg Harris with a combined heat input of 5.34 MMBtu/hr firing natural gas or propane.

VOC and HAP emissions from the dryers are controlled by a Wolverine RTO-25,000 thermal oxidizer shared with Press #3.

In a previous license a BACT analysis was performed on Press #5. BACT for Press #5 was found to be the following:

1. Emissions contained in the dryers shall vent to a thermal oxidizer that will achieve 99% destruction of VOCs based on 800 ppmv or higher VOC inlet measured as propane at actual air stream conditions. If the inlet VOC content is below 800 ppmv, the VOC outlet shall not exceed 25 ppmv at actual stack conditions.
2. Total annual VOC emissions from Press #5 shall not exceed 12.3 tons/year on a 12 month rolling total basis.
3. Dingley shall fire propane or natural gas in the thermal oxidizers and dryers.

Streamlining

Opacity

Dingley accepts streamlining for opacity requirements. Chapter 101, Section 2(A)(1) of the Department's regulations and Best Practical Treatment (BPT) requirements are applicable. The Best Practical Treatment (BPT) opacity limit is more stringent. Therefore, only the more stringent BPT opacity limit is included in this license.

Particulate Matter

Dingley accepts streamlining for particulate matter requirements. Chapter 103 of the Department's regulations and BPT requirements are applicable. The Best Practical Treatment (BPT) particulate matter limit is more stringent. Therefore, only the more stringent BPT particulate matter limit is included in this license.

Sulfur Dioxide

Dingley accepts streamlining for sulfur dioxide requirements. Chapter 106 and BPT limits are applicable. The BPT sulfur dioxide limit is more stringent. Therefore, only BPT requirements are included in this license.

Periodic Monitoring

Periodic monitoring for Presses #1, 3, 4, 5, and the associated dryers shall consist of recordkeeping which includes records of ink and solvent usage and fuel use through purchase receipts indicating amounts (scf or gallons).

Periodic monitoring for the catalytic incinerator thermal oxidizer shall consist of maintaining fuel use records and monitoring for temperature recorded daily.

Based on the type and amount of fuel for which this equipment was designed, there is no reasonable likelihood it will exceed the opacity limits. Therefore, periodic monitoring by the source for opacity in the form of visible emission testing is not required. However, neither the EPA nor the State is precluded from performing its own testing and may take enforcement action for any violations discovered.

D. Bindery/Ink Jet Operations

Once the material has been printed on one of the presses at Dingley, it is conveyed to an ink jet printing process. In this process names, addresses, and other information is printed on the cover of the publications. The ink currently used in this process is a methanol based ink. All but two printers use Quad Tech SRS-E100 solvent recovery units.

In a previous license a Best Available Control Technology (BACT) analysis was preformed on this operation. The Ink Jet Operations are therefore exempt from VOC RACT (MEDEP Chapter 134, Section 1.C.2). BACT for the Ink Jet Operations was found to be the continued use of solvent recovery systems and good housekeeping practices.

E. Cold Cleaning Degreasers

Dingley operates multiple degreasers. Each of these units uses solvents to clean metal parts and is subject to MEDEP Chapter 130. Dingley may add/subtract degreasers without applying for a license amendment provided it files the requisite initial certification with DEP as provided in Chapter 130.

Periodic monitoring

Periodic monitoring for the degreaser units shall consist of recordkeeping including records of solvent added and removed.

F. Facility Emissions

Total Allowable Annual Emissions for the Facility
(used to calculate the license fee)

Pollutant	Tons/Year
PM	1.6
PM_{10}	1.6
SO_2	1.4
NO_X	18.0
CO	18.2
VOC	60.1

III. AIR QUALITY ANALYSIS

According to Chapter 140 of the Department's regulations, an existing Part 70 source shall be exempt from an impact analysis with respect to a regulated pollutant whose allowable emissions do not exceed the following:

Pollutant	Tons/year
PM	25
PM_{10}	25
SO_2	50
NO_x	100
CO	250

Based on facility license allowed emissions, Dingley is below the emissions level required for modeling and monitoring.

ORDER

Based on the above Findings and subject to conditions listed below, the Department concludes that emissions from this sources:

- will receive Best Practical Treatment;
- will not violate applicable emissions standards
- will not violate applicable ambient air quality standards in conjunction with emissions from other sources.

The Department hereby grants the Part 70 License A-506-70-A-I pursuant to MEDEP Chapter 140 and the preconstruction permitting requirements of MEDEP Chapter 115 and subject to the standard and special conditions below.

All federally enforceable and State-only enforceable conditions in existing air licenses previously issued to Dingley pursuant to the Department's preconstruction permitting requirements in Chapters 108 or 115 have been incorporated into this Part 70 license, except for such conditions that MEDEP has determined are obsolete, extraneous or otherwise environmentally insignificant, as explained in the findings of fact accompanying this permit. As such the conditions in this license supercede all previously issued air license conditions.

Federally enforceable conditions in this Part 70 license must be changed pursuant to the applicable requirements in Chapter 115 for making such changes and pursuant to the applicable requirements in Chapter 140.

For each standard and special condition which is state enforceable only, state-only enforceability is designated with the following statement: **Enforceable by State-only**.

STANDARD CONDITIONS

(1) Employees and authorized representatives of the Department shall be allowed access to the licensee's premises during business hours, or any time during which any emission units are in operation, and at such other times as the Department deems necessary for the purpose of performing tests, collecting samples, conducting inspections, or examining and copying records relating to emissions and this license (Title 38 MRSA§347-C);

(2) The licensee shall acquire a new or amended air emission license prior to commencing construction of a modification, unless specifically provided for in Chapter 140;

(3) Approval to construct shall become invalid if the source has not commenced construction within eighteen (18) months after receipt of such approval or if construction is discontinued for a period of eighteen (18) months or more. The

Department may extend this time period upon a satisfactory showing that an extension is justified, but may condition such extension upon a review of either the control technology analysis or the ambient air quality standards analysis, or both;

(4) The licensee shall establish and maintain a continuing program of best management practices for suppression of fugitive particulate matter during any period of construction, reconstruction, or operation which may result in fugitive dust, and shall submit a description of the program to the Department upon request; **Enforceable by State-only**

(5) The licensee shall pay the annual air emissions license fee to the Department, calculated pursuant to Title 38 MRSA §353;

(6) The Part 70 license does not convey any property rights of any sort, or any exclusive privilege;

(7) The licensee shall maintain and operate all emission units and air pollution control systems required by the air emission license in a manner consistent with good air pollution control practice for minimizing emissions; **Enforceable by State-only**

(8) The licensee shall maintain sufficient records, to accurately document compliance with emission standards and license conditions and shall maintain such records for a minimum of six (6) years. The records shall be submitted to the Department upon written request or in accordance with other provisions of this license;

(9) The licensee shall comply with all terms and conditions of the air emission license. The submission of notice of intent to reopen for cause by the Department, the filing of an appeal by the licensee, the notification of planned changes or anticipated noncompliance by the licensee, or the filing of an application by the licensee for the renewal of a Part 70 license or amendment shall not stay any condition of the Part 70 license.

(10) All terms and conditions are enforceable by EPA and citizens under the CAA unless specifically designated as state enforceable.

(11) The licensee may not use as a defense in an enforcement action that the disruption, cessation, or reduction of licensed operations would have been necessary in order to maintain compliance with the conditions of the air emission license;

(12) In accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department, the licensee shall:

(a) perform stack testing under circumstances representative of the facility's normal process and operating conditions:

(i) within sixty (60) calendar days of receipt of a notification to test from the Department or EPA, if visible emissions, equipment operating parameters, staff inspection, air monitoring or other cause indicate to the Department that equipment may be operating out of compliance with emission standards or license conditions;

(ii) to demonstrate compliance with the applicable emission standards; or

(iii)pursuant to any other requirement of this license to perform stack testing.

(b) install or make provisions to install test ports that meet the criteria of 40 CFR Part 60, Appendix A, and test platforms, if necessary, and other accommodations necessary to allow emissions testing; and

(c) submit a written report to the Department within thirty (30) days from the date of test completion.

Enforceable by State-only

(13) If the results of a stack test performed under circumstances representative of the facility's normal process and operating conditions indicates emissions in excess of the applicable standards, then:

(a) within thirty (30) days following receipt of such test results, the licensee shall re-test the non-complying emission source under circumstances representative of the facility's normal process and operating conditions and in accordance with the Department's air emission compliance test protocol and 40 CFR Part 60 or other method approved or required by the Department; and

(b) the days of violation shall be presumed to include the date of stack test and each and every day of operation thereafter until compliance is demonstrated under normal and representative process and operating conditions, except to the extent that the facility can prove to the satisfaction of the Department that there where intervening days during which no violation occurred or that the violation was not continuing in nature; and

(c) the licensee may, upon the approval of the Department following the successful demonstration of compliance at alternative load conditions, operate under such alternative load conditions on a interim basis prior to a demonstration of compliance under normal and representative process and operating conditions.

Enforceable by State-only

(14) Notwithstanding any other provision in the State Implementation Plan approved by the EPA or Section 114(a) of the CAA, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any statute, regulation, or Part 70 license requirement.

(15) Compliance with the conditions of this Part 70 license shall be deemed compliance with any Applicable requirement as of the date of license issuance and is deemed a permit shield, provided that:

(a) Such Applicable and state requirements are included and are specifically identified in the Part 70 license, except where the Part 70 license term or condition is specifically identified as not having a permit shield; or

(b) The Department, in acting on the Part 70 license application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the Part 70 license includes the determination or a concise summary, thereof.

Nothing in this section or any Part 70 license shall alter or effect the provisions of Section 303 of the CAA (emergency orders), including the authority of EPA under Section 303; the liability of an owner or operator of a source for any violation of Applicable requirements prior to or at the time of permit issuance; or the ability of EPA to obtain information from a source pursuant to section 114 of the CAA.

(16) The licensee shall retain records of all required monitoring data and support information for a period of at least six (6) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the Part 70 license.

(17) The licensee shall maintain records of all deviations from license requirements. Such deviations shall include, but are not limited to malfunctions, failures, downtime, and any other similar change in operation of air pollution control systems or the emission unit itself that is not consistent with the terms and

conditions of the air emission license. The licensee shall notify the Department within two (2) days or the next working day, whichever is later, of such occasions and shall report the probable cause, corrective action, and any excess emissions in the units of the applicable emission limitation;

(18) Upon the written request of the Department, the licensee shall establish and maintain such records, make such reports, install, use, and maintain such monitoring equipment, sample such emissions (in accordance with such methods, at such locations, at such intervals, and in such manner as the Department shall prescribe), and provide other information as the Department may reasonably require to determine the licensee's compliance status.

(19) The licensee shall submit semiannual reports of any required periodic monitoring. All instances of deviations from Part 70 license requirements must be clearly identified in such reports. All required reports must be certified by a responsible official.

(20) The licensee shall submit a compliance certification to the Department and EPA at least annually, or more frequent if specified in the Applicable requirement by the Department. The compliance certification shall include the following:

(a) The identification of each term or condition of the Part 70 license that is the basis of the certification;

(b) The compliance status;

(c) Whether compliance was continuous or intermittent;

(d) The method(s) used for determining the compliance status of the source, currently and over the reporting period; and

(e) Such other facts as the Department may require to determine the compliance status of the source;

(21) The Part 70 license shall be reopened for cause by the Department or EPA, prior to the expiration of the Part 70 license, if:

(a) Additional Applicable requirements under the CAA become applicable to the Part 70 major source with a remaining Part 70 license term of 3 or more years. However, no opening is required if the effective date of the requirement is later than the date on which the Part 70 license is due to expire, unless the original Part 70 license or any of its terms and conditions has been extended pursuant to Chapter 140;

(b) Additional requirements (including excess emissions requirements) become applicable to the Title IV source under the acid rain program. Upon approval by EPA, excess emissions offset plans shall be deemed to be incorporated into the Part 70 license;

(c) The Department or EPA determines that the Part 70 license contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms of conditions of the Part 70 license; or

(d) The Department or EPA determines that the Part 70 license must be revised or revoked to assure compliance with the Applicable requirements.

The licensee shall furnish to the Department within a reasonable time any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the Part 70 license or to determine compliance with the Part 70 license.

(22) No license revision or amendment shall be required, under any approved economic incentives, marketable licenses, emissions trading and other similar programs or processes for changes that are provided for in the Part 70 license.

SPECIAL CONDITIONS

(23) Permit Shield for Non-Applicable Requirements
The following requirements have been specifically identified as not applicable based upon information submitted by the licensee in an application dated March 20, 2000.

	SOURCE	CITATION	DESCRIPTION	BASIS FOR DETERMINATION
A	Facility	MEDEP Chapter 123	Paper Coating Regulation	No equipment applicable to Chapter 123
B	Facility	MEDEP Chapter 126	Capture Efficiency Test Procedures	No equipment applicable to Chapter 123 with add on equipment
C	Facility	MEDEP Chapter 132	Graphic Arts-Rotogravure and Flexography	Facility has only lithographic printing presses
D	Facility	MEDEP Chapter 134	VOC RACT	Emission sources which have not been subjected to BACT total less than 40 ton of VOCs per year
E	Facility	40 CFR Part 60, Subpart QQ	Graphic Arts Industry: Publication Rotogravure Printing	Facility has only lithographic printing presses
F	Facility	40 CFR Part 63, Subpart KK	Emission Standards for the Printing and Publishing Industry	Facility is not a major source of HAPS and operates only lithographic printing presses

(24) Presses #1, 3, 4, & 5

A. Dingley is licensed to operate Presses #1, 3, 4, & 5 and the associated dryers. [MEDEP Chapter 140, BPT]

B. Dingley shall fire only natural gas or propane in the dryers and the thermal oxidizer. [MEDEP Chapter 140, BPT] **Enforceable by State-only**

C. Emissions from the dryers on Press #1 and #4 shall be vented through the catalytic incinerator. [MEDEP Chapter 140, BPT]

D. Emissions from the catalytic incinerator shall not exceed the following limits:

Pollutant	***lb/MMBtu***	***Origin and Authority***	***Enforceability***
PM	0.12	MEDEP, Chapter 103, Section 2(B)(1)(a)	-

Pollutant	***lb/hr***	***Origin and Authority***	***Enforceability***
PM	0.08	MEDEP Chapter 140, BPT	**Enforceable by State-only**
PM_{10}	0.08	MEDEP Chapter 140, BPT	**Enforceable by State-only**
SO_2	0.01	MEDEP Chapter 140, BPT	**Enforceable by State-only**
NO_X	2.15	MEDEP Chapter 140, BPT	**Enforceable by State-only**
CO	0.54	MEDEP Chapter 140, BPT	**Enforceable by State-only**

E. Emissions from Presses #1 and #4 shall vent to a catalytic incinerator that will achieve 95% destruction of VOCs from the dryers. Compliance shall be demonstrated by stack testing once every two years. After two sets of successful compliance demonstrations, Dingley may apply to reduce the frequency of stack testing required. [MEDEP Chapter 140, BPT]

F. The catalytic incinerator shall maintain a temperature of at least 600^oF to ensure destruction of the VOCs. Compliance shall be demonstrated by thermocouples maintained in the incinerator chambers. The catalytic incinerator control system is equipped with interlocks which shut down the presses if the temperature drops below 600^oF. The Temperature shall be recorded daily by operators. [MEDEP Chapter 140, BPT]

G. Emissions from the dryers on Presses #3 and #5 shall be vented through the thermal oxidizer. [MEDEP Chapter 140, BPT]

H. Emissions from the thermal oxidizer shall not exceed the following limits:

Pollutant	***lb/MMBtu***	***Origin and Authority***	***Enforceability***
PM	0.12	MEDEP, Chapter 103, Section 2(B)(1)(a)	-

Pollutant	***lb/hr***	***Origin and Authority***	***Enforceability***
PM	0.3	MEDEP Chapter 140, BPT	**Enforceable by State-only**
PM_{10}	0.3	MEDEP Chapter 140, BPT	**Enforceable by State-only**
SO_2	0.3	MEDEP Chapter 140, BPT	**Enforceable by State-only**
NO_X	3.1	MEDEP Chapter 140, BPT	**Enforceable by State-only**
CO	3.9	MEDEP Chapter 140, BPT	**Enforceable by State-only**

I. Emissions from Presses #3 and #5 shall vent to a thermal oxidizer that will achieve 99% destruction of VOC from the dryers based on 800 ppmv or higher VOC inlet measured as propane at actual air stream conditions. If the inlet VOC content is below 800 ppmv, the VOC outlet shall not exceed 25 ppmv at actual stack conditions. Compliance shall be demonstrated by stack testing once every two years. After two sets of successful compliance demonstrations, Dingley may apply to reduce the frequency of stack testing required. [MEDEP Chapter 140, BPT]

J. The thermal oxidizer shall maintain a temperature of at least 1300^{o}F or the temperature which successful stack testing demonstrates a destruction efficiency of at least 99%. Compliance shall be demonstrated by thermocouples maintained in the incinerator chambers. The thermal oxidizer control system is equipped with interlocks which shut down the presses if the temperature drops below 1300^{o}F. The temperature shall be recorded daily by operators. [MEDEP Chapter 140, BPT]

K. Compliance with particulate matter limits for the catalytic incinerator and thermal oxidizer are on a 1-hour block average basis and shall be demonstrated in accordance with 40 CFR Part 60, Appendix A, Method 5 upon request by the Department. [MEDEP Chapter 140, BPT]

L. Visible emissions from the presses, the thermal oxidizer, and the catalytic incinerator shall each not exceed 10% opacity on a six minute block average basis. [MEDEP Chapter 140, BPT]

(25) Dingley shall not exceed a facility wide fuel cap of 179,000 MMBtu/year (12 month rolling total) of propane, natural gas, or a combination of both. [MEDEP Chapter 140, BPT] **Enforcable by State-only**

(26) Overall VOC emissions from the facility shall not exceed 60.1 ton/year based on a 12 month rolling total. Dingley shall maintain monthly records to demonstrate compliance with this limit. [MEDEP Chapter 140, BPT]

(27) Hazardous Air Pollutant (HAP) emissions listed in Section 112(b) of the Clean Air Act from the facility shall not exceed 9.9 ton/year for any single HAP and 24.9 ton/year for all HAPs combined, both based on a 12 month rolling total. Dingley shall maintain monthly records to demonstrate compliance with this limit. [MEDEP Chapter 140, BPT]

(28) Documentation of VOC and HAP emissions for Dingley shall utilize the following six assumptions when calculating monthly emissions:

1. 70% of the fountain solutions flash off in the dryer.

2. 40% of the machine applied blanket wash flashes off in the dryer.

3. 20% of the VOCs and HAPs in the ink are retained in the substrate.

4. The remaining 80% of the VOCs and HAPs in the ink flash off in the dryer.

5. 100% of the remaining VOCs and HAPs, that are not shipped off-site as hazardous waste, are emitted.

6. VOC destruction efficiencies for the catalytic incinerator and thermal oxidizer are to be based on either stack test results or factors approved by the Department.

[MEDEP Chapter 140, BPT]

(29) **Bindery/Ink Jet Operations**

Dingley shall continue to use solvent recovery systems on the methanol ink jet printers. [MEDEP Chapter 140, BPT]

(30) **Cold Cleaning Degreasers**

Dingley shall label the parts washers with operational standards, equip the washers with covers if the solvent's vapor pressure is >15 mmHG at 100°F, close covers when not in use, drain parts for 15 seconds or longer. Dingley shall not degrease porous material and shall keep drafts to < 40 m/minute, repair leaks, and keep records of solvent added and removed. [MEDEP Chapter 130]

(31) **Temperature Monitoring**

The temperature monitor required in the incineration chambers of the catalytic incinerator and thermal oxidizer shall be the primary means of demonstrating compliance with emission standards set by this Order, statute, state or federal

regulation, as applicable. The licensee shall comply with the following: [MEDEP Chapter 140, BPT]

A. Recordkeeping
For the temperature monitoring and recording, required by this license, the licensee shall maintain records of the most current six year period and the records shall include:
1. Documentation which shows monitor operational status during all source operating time, including specifics for calibration and audits; and
2. A complete data set of all monitored parameters as specified in this license. All parameter records shall be made available to the Bureau of Air Quality upon request.
3. If the temperature monitoring systems are recording accurate and reliable data less than 95% of the source-operating time within any quarter of the calendar year, the Department may initiate enforcement action and may include in that enforcement action any period of time that the monitoring system was not recording accurate and reliable data during that quarter unless the licensee can demonstrate to the satisfaction so the Department that the failure of the system to record accurate and reliable data was due to the performance of established quality assurance and quality control procedures or unavoidable malfunctions.

(32) **Semiannual Reporting**
The licensee shall submit semiannual reports every six months to the Bureau of Air Quality. The initial semiannual report is due October 30, 2001, 30 days from the end of the second calendar quarter following the date of signature of this license.
A. Each semiannual report shall include a summary of the periodic monitoring required by this license.
B. All instances of deviations from license requirements and the corrective action taken must be clearly identified and provided to the Department in summary form for each six-month interval.
[MEDEP Chapter 140]

(33) **Annual Compliance Certification**
The licensee shall submit an annual compliance certification to the Department and EPA in accordance with Condition (20) of this license. The initial annual compliance certification is due April 30, 2002 with the submittal of the second semiannual report after the signature date of this license. [MEDEP Chapter 140]

(34) **Annual Emission Statement**
The licensee shall annually report to the Department, in a specified format, fuel use, operating rates, use of materials and other information necessary to accurately update the State's emission inventory. [MEDEP Chapter 137]

(35) The licensee is subject to the State regulations listed below.

Origin and Authority	Requirement Summary
Chapter 102	Open Burning
Chapter 109	Emergency Episode Regulation
Chapter 110	Ambient Air Quality Standard
Chapter 116	Prohibited Dispersion Techniques

(36) The licensee is subject to all applicable requirements of 40 CFR Part 82, Subpart F (Refrigerant Control).

(37) **Certification by a Responsible Official**
All reports (including semiannual reports and annual compliance certifications) required by this license to be submitted to the Bureau of Air Quality must be signed by a responsible official. [MEDEP Chapter 140]

(38) The term of this license shall be five (5) years from the signature date below.

DONE AND DATED IN AUGUSTA, MAINE THIS DAY OF 2001.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
MARTHA G. KIRKPATRICK, COMMISSIONER

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: March 24, 2000
Date of application acceptance: March 24, 2000

Date filed with the Board of Environmental Protection _____

This Order prepared by Lynn Ross, Bureau of Air Quality.